

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ROUMANN CONSULTING INC., and
RONALD ROUSSE,

Plaintiffs,

v.

Case No. 17-CV-1407

T.V. JOHN & SON, INC., and
THE KROGER CO.,

Defendants.

AFFIDAVIT OF SCOTT R. HALLOIN

STATE OF WISCONSIN)
) ss
MILWAUKEE COUNTY)

I, Scott R. Halloin, being first duly sworn on oath, depose and state as follows:

1. I am one of the attorneys of record for Plaintiffs Roumann Consulting, Inc. and Ronald Rousse. The statements in this affidavit are based on my personal knowledge and review of the submissions and discovery in this matter.

2. True and correct copies of the cited transcript pages from the January 17, 2019 deposition of Ronald Rousse are attached as Exhibit 1.

3. True and correct copies of the cited transcript pages from the September 4, 2018 deposition of Timothy Nelson are attached as Exhibit 2.

4. True and correct copies of the cited transcript pages from the March 6, 2019 deposition of David Schlidt are attached as Exhibit 3.

5. True and correct copies of the cited transcript pages from the April 23, 2019 deposition of Dean Handrow are attached as Exhibit 4.

6. True and correct copies of the cited transcript pages from the September 5, 2018 deposition of Randy Neptune are attached as Exhibit 5.

7. A true and correct copy of Timothy Nelson's August 31, 2017 letter is attached as Exhibit 6.

8. True and correct copies of the cited transcript pages from the August 30, 2018 deposition of Edward Manning are attached as Exhibit 7.

9. True and correct copies of T.V. John & Son, Inc.'s August 21, 2017 letters to Roumann Consulting, Inc.'s Customer contacts (previously marked Plaintiffs' Deposition Exhibits 65 through 67), are attached as Exhibit 8.

10. True and correct copies of the cited transcript pages from the April 30, 2018 deposition of Chad Johnson are attached as Exhibit 9.

11. A true and correct copy of T.V. John & Son, Inc.'s Responses and Objections to Roumann Consulting Inc.'s Third Requests for Production of Documents, Requests to Admit, and Interrogatories dated September 17, 2018 are attached as Exhibit 10.

12. A true and correct copy of T.V. John & Son, Inc.'s July 15, 2019 Expert Witness Disclosure containing the report of Michael Kuhn is attached as Exhibit 11.

13. A true and correct copy of Gil Ward's March 23, 2018 email to Mr. Rousse is attached as Exhibit 12.

14. True and correct copies of the cited transcript pages from the May 15, 2019 deposition of Roumann Consulting, Inc. are attached as Exhibit 13.

15. True and correct copies of the cited transcript pages from the December 13, 2018 testimony of T.V. John & Son, Inc. are attached as Exhibit 14.

16. A true and correct copy of T.V. John & Son, Inc.'s October 31, 2018 Commission Calculation (previously marked as Plaintiffs' Deposition Exhibit 97(f)) is attached as Exhibit 15.

17. Discovery in this action is closed. T.V. John & Son, Inc. elected not to depose any of Roumann Consulting and Mr. Rousse's expert witnesses within the discovery period.

18. True and correct copies of the cited transcript pages from the September 12, 2019 deposition of Michael Kuhn are attached as Exhibit 16.

19. A true and correct copy of Ron Rousse's June 26, 2017 email to Timothy Nelson, previously marked as Plaintiffs' Deposition Exhibit 54, is attached as Exhibit 17.

FURTHER AFFIANT SAYETH NAUGHT.

s/ Scott R. Halloin

Scott R. Halloin

Signed and sworn to before me
This 8th day of May, 2019

s/ Kimberly Finnigan

Notary Public, State of Wisconsin
My commission expires December 4, 2020.